

January 15, 2008

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

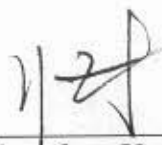
EB-06-36
Certification of CPNI Filing

Dear Ms. Dortch:

In accordance with the Section 64.2009(e) of the Commission's rules, please find attached our company's annual compliance certificate for 2007, together with a statement describing the company's program to protect Customer Proprietary Network Information.

Sincerely,


China Telecom (Americas) Corporation

By: 
Zhao-feng Ye
Administrative Director

**Annual Certificate of Compliance Regarding
Protection of Customer Proprietary Network Information**

The undersigned certifies as follows:

1. I am a corporate officer of China Telecom (Americas) Corporation (the "Company").
2. I have personal knowledge that the Company has established and implemented a program to protect customer proprietary network information ("CPNI") as required by Section 64.2009 of the Commission's regulations.
3. The program makes the Company's Administrative Director responsible for implementation and approval of all uses of CPNI and establishes:
 - A mechanism for customers to opt-out of receiving marketing information based on their CPNI
 - A record-keeping system to determine the customer's decision regarding use of CPNI, any marketing and sales campaign using CPNI and all instances of when CPNI was disclosed or provided to third parties
 - A disciplinary procedure for improper use of CPNI by employees, agents and contractors
 - A training mechanism to ensure that all employees, agents and contractors are aware of when they can use CPNI in sales and marketing
 - A standard contract provision for enterprise customers regarding use of CPNI


Ling-Ping Kong
Vice President

Dated: January 14, 2008

Program for the Protection of Customer Proprietary Network Information

China Telecom (Americas) Corporation ("CTA" or the "Company") is adopting this program for the protection of Customer Proprietary Network Information ("CPNI"), as mandated by Section 222 of the Telecommunications Act of 1996 and Section 47 C.F.R. 64.209.

Objective of Program. The objective of this program is to protect the confidentiality of the Company's Customer Proprietary Network Information.

Definition of CPNI. CPNI is defined as information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecom service provided to a customer. For example, it includes type of line, class of service, current charges, usage data and calling patterns. CPNI is derived from all customers, including other carriers.

Use and Disclosure of, and Access to, CPNI. Except with customer approval or in response to a lawful request of a governmental authority, CPNI may only be used or disclosed in connection with the provision of telecommunications services from which such information is derived and services necessary to, or used in, the provision of telecommunications services.

Access to CPNI is only available to those persons (employees, agents, attorneys) who require the information to provide the service to which the information relates or in connection with the provision of such service. Notwithstanding the foregoing, CPNI may be used by CTA employees, either directly or through its agents, to (i) initiate, render, bill and collect for telecommunications services; (ii) protect the rights of property of the Company, or to protect users and other carriers from fraudulent or illegal use of, or subscription to, such services; and (iii) provide inbound marketing, referral or administrative services to the customer for the duration of the call, if the call was initiated by the customer and the customer approves of the Company's use of CPNI to provide such services.

CTA does not use, disclose or permit access to CPNI to data brokers. If agents or contractors or joint venture partners have access to CPNI, the parties must execute a confidentiality agreement insuring the ongoing confidentiality of the CPNI.

Administrator. The Company's Administrative Director shall be in charge of the program to protect CPNI. The Administrative Director will monitor the implementation of this policy, ensure this policy complies with U.S. law (including FCC regulations) and submit the annual certificate required by the Section 64.209. If there is an improper release of CPNI, the Administrative Director shall determine the reason and take steps to prevent further releases.

Record-keeping. The Administrative Director will keep a record for one year of (i) sales and marketing campaign that use CPNI, including a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered in the campaign; and (ii) all instances where CPNI was disclosed or provided to third parties, or where

third parties were allowed access to CPNI. The Administrative Director will maintain a record of which customers have opted out of receiving marketing information using CPNI.

Employee Training and Use of CPNI. Each employee and agent or contractor of CTA will receive a copy of this program (electronically or in hard copy) and a copy will be included in the Company's employee handbook. The Administrative Director will send employees and agents and contractors an annual reminder of this program. In addition, the Company will provide annual training at one of the sales meetings on when employees are or are not authorized to use CPNI in marketing. Each employee, agent or contractor involved in marketing or sales must obtain permission from the Administrative Director for any marketing campaigns using CPNI.

Customer Consent. CPNI may be used to offer additional services of the type the customer already purchases. For example, CPNI may be used to seek renewal of existing contracts or to provide similar services to additional locations or at a higher capacity. CTA must seek customer consent to market different types of telecom services, such as IP Access to a customer receiving international private line service.

CTA will send each existing customer a copy of the CPNI policy attached to this policy ("CPNI Policy") and provide the CPNI Policy to every new customer at the time a contract is executed. CTA will give each Customer 30 days to "opt-out" of receiving marketing services based upon CPNI. CTA will post a copy of its CPNI Policy on its website. Customers may opt out of receiving marketing services either by sending an email to sales@chinatelecomusa.com or calling corporate headquarters at 703-787-0088.

Disciplinary Procedures. If there is an improper release of CPNI, the Administrative Director will investigate and determine who was responsible for that release. In consultation with the President of the Company, the Administrative Director will decide what disciplinary action will be taken against the releasor. If the person responsible is an employee of CTA, disciplinary action may range from a forfeiture of salary, suspension from duty or termination of employment. If the person responsible is an agent or contractor for CTA, disciplinary action may range from forfeiture of salary, suspension of the contractual relationship or termination of the services of the agent or contractor. The severity of disciplinary action will depend on whether the improper release was inadvertent or deliberate.